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**Proposed Plan for an
Amendment to the
Environmental Restoration
Disposal Facility Record of
Decision, Hanford Site,
Richland, Washington**



United States
Department of Energy

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Proposed Plan for an Amendment to the Environmental Restoration Disposal Facility Record of Decision, Hanford Site, Richland, Washington

October 2001



United States Department of Energy

P.O. Box 550, Richland, Washington 99352

PROPOSED PLAN FOR AN AMENDMENT TO THE ENVIRONMENTAL RESTORATION DISPOSAL FACILITY RECORD OF DECISION

Hanford Site, Richland, Washington

INTRODUCTION

The U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology), and the U.S. Department of Energy (DOE) (hereinafter referred to as the Tri-Parties) are proposing an amendment to the **Environmental Restoration Disposal Facility Record of Decision (ERDF ROD)**. EPA and DOE are issuing this **Proposed Plan** as part of their public participation responsibilities under 40 *Code of Federal Regulations* (CFR) 300.430(f)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

EPA is the lead regulatory agency for the ERDF Project. This Proposed Plan includes two elements intended to promote Hanford Site cleanup activities by broadening the utilization and operation of ERDF as follows:

- Construct ERDF's planned Phase III using the current disposal cell design.
- Enable centralized interim staging of remediation waste at ERDF prior to treatment and disposal, as appropriate.

On January 20, 1995, the Tri-Parties signed the ERDF ROD to provide waste disposal capacity for cleanup of contaminated areas at the Hanford Site. The ERDF ROD provides the overall plan for construction of the facility and disposal of remediation waste originating only from the Hanford Site. A subsequent **Explanation of Significant Difference (ESD)** to the ERDF ROD was issued on July 26, 1996, to allow for the disposal of investigation-derived waste, **decontamination and decommissioning (D&D) waste**, waste from **Resource Conservation and Recovery Act 1976 (RCRA)** past-practice operable units and closure waste, and non-RCRA waste from inactive treatment, storage, and disposal facilities. The waste is accepted for ERDF disposal on a case-by-case basis, in accordance with a ROD or removal action memorandum issued under the **Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)** and the NCP. The ESD also authorized the conditional

use of ERDF leachate for dust suppression and waste compaction.

Two amendments to the ERDF ROD have previously been issued. The first amendment, signed on September 30, 1997, authorized the first ERDF expansion to disposal cells 3 and 4 and limited treatment of waste by stabilization and encapsulation prior to disposal at ERDF. The second amendment was signed on March 23, 1999, authorizing the delisting of ERDF leachate under CERCLA.

MARK YOUR CALENDAR

A public comment period will be held from October 29, 2001, to November 28, 2001. The public is invited to comment on the proposal to construct Phase III of ERDF and the proposal to stage Hanford Site remediation waste at ERDF prior to treatment and disposal. A public meeting will be held if a request is received by EPA before November 15, 2001.

EPA and DOE, in consultation with Ecology, may modify the preferred alternative or select another alternative presented in this plan based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives presented in this *Proposed Plan*. The decision reached will be announced to the public and will include a summary of responses to comments submitted by the public. All submitted written comments will be placed in the Administrative Record for ERDF.

To request a public meeting in your area or to send written comments, contact:

David Einan
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Comments may also be made via e-mail to einan.david@epa.gov, by phone at (509) 376-3883, or by calling the Hanford Cleanup Toll-Free Line at 1-800-321-2008.

This Proposed Plan identifies preferred actions that are intended to allow continued removal and disposal of contaminants from the 100, 200, and 300 Areas of the Hanford Site. Removal of contaminants from these areas and disposal in ERDF would be based on the RODs for these remedial actions.

The ERDF is currently identified in the 100 Area RODs, 300 Area RODs, and a number of removal action memoranda as the location for disposal of waste resulting from actions in these areas. The estimated waste quantity to be generated from these actions is 10 million tons. The RODs, supporting information, and associated public comments can be found in the **Administrative Record** (see box on page 9).

BACKGROUND

The fundamental objective of ERDF is to support the timely removal and disposal of contaminants from various locations within the Hanford Site. Hanford Site remedial action RODs and action memoranda identify ERDF as the location for disposal of resulting waste. The location of the Hanford Site and ERDF are shown in Figure 1.

A summary of the remedy chosen in the ERDF ROD is as follows:

- Select the ERDF site for construction of the initial disposal cells and subsequent expansion phases. The facility may cover a maximum of 4.1 km² (1.6 mi²).
- Construct and operate the first two disposal cells to provide an approximate waste disposal capacity of 2 million tons. The selected designs meet RCRA minimum technology requirements (40 CFR 264, Subpart N).
- Close the landfill by placing a modified RCRA-compliant closure cover over the waste. The design will, at a minimum, comply with applicable RCRA requirements found in 40 CFR 264, Subpart N.

Construction of the first two ERDF disposal cells began in February 1995, and waste was initially placed in ERDF on July 1, 1996. Construction of the second set of disposal cells began in September 1998, and waste was initially placed in these cells in June 2000.

As of July 1, 2001, ERDF received 3 million tons of waste. The operating disposal cells have a total maximum waste capacity of 5 million tons. In addition to the disposal cells, the ERDF site contains a transportation staging area, an administration building, worker offices and a change trailer, a waste container staging area, leachate collection tanks, a spoils pile used for daily operational cover, an employee parking area, a truck scale, and haul roads.

The layout and size of the existing ERDF cells and proposed Phase III trench are shown in Figure 2. The deep, single-trench configuration used for the first four cells and preferred for Phase III construction minimizes the areal extent of the waste facility and offers the following advantages in comparison to other configurations:

- Less habitat disruption
- Reduced material needs
- Reduced leachate generation
- Lower costs for the trench liner and the interim and final covers.

The operation of ERDF has proven to be the most cost-effective means to handle Hanford Site remediation waste.

DESCRIPTION OF PREFERRED ALTERNATIVE

ERDF Phase III Construction

The ERDF ROD specified that expansion of the facility would be authorized by ROD amendment. It is proposed that four additional ERDF cells be constructed as needed and operated for disposal of Hanford Site remediation waste. This Phase III construction would be located entirely within the 4.1-km² (1,024-acre) area selected for ERDF, as defined in the ERDF ROD. Additional disposal cells may be required in the future.

The current design of ERDF is a single, 21.3-m (70-ft)-deep trench consisting of two side-by-side cells, with final dimensions of 432.8 m (1,420 ft) long by 219.5 m (720 ft) wide at the top of the trench. The facility is equipped with a double-liner and a leachate collection and recovery system that meets the requirements for hazardous waste landfills under RCRA. The same RCRA design selected for the existing ERDF disposal cells would be used for the Phase III cells.

Figure 1. Hanford Site Map.

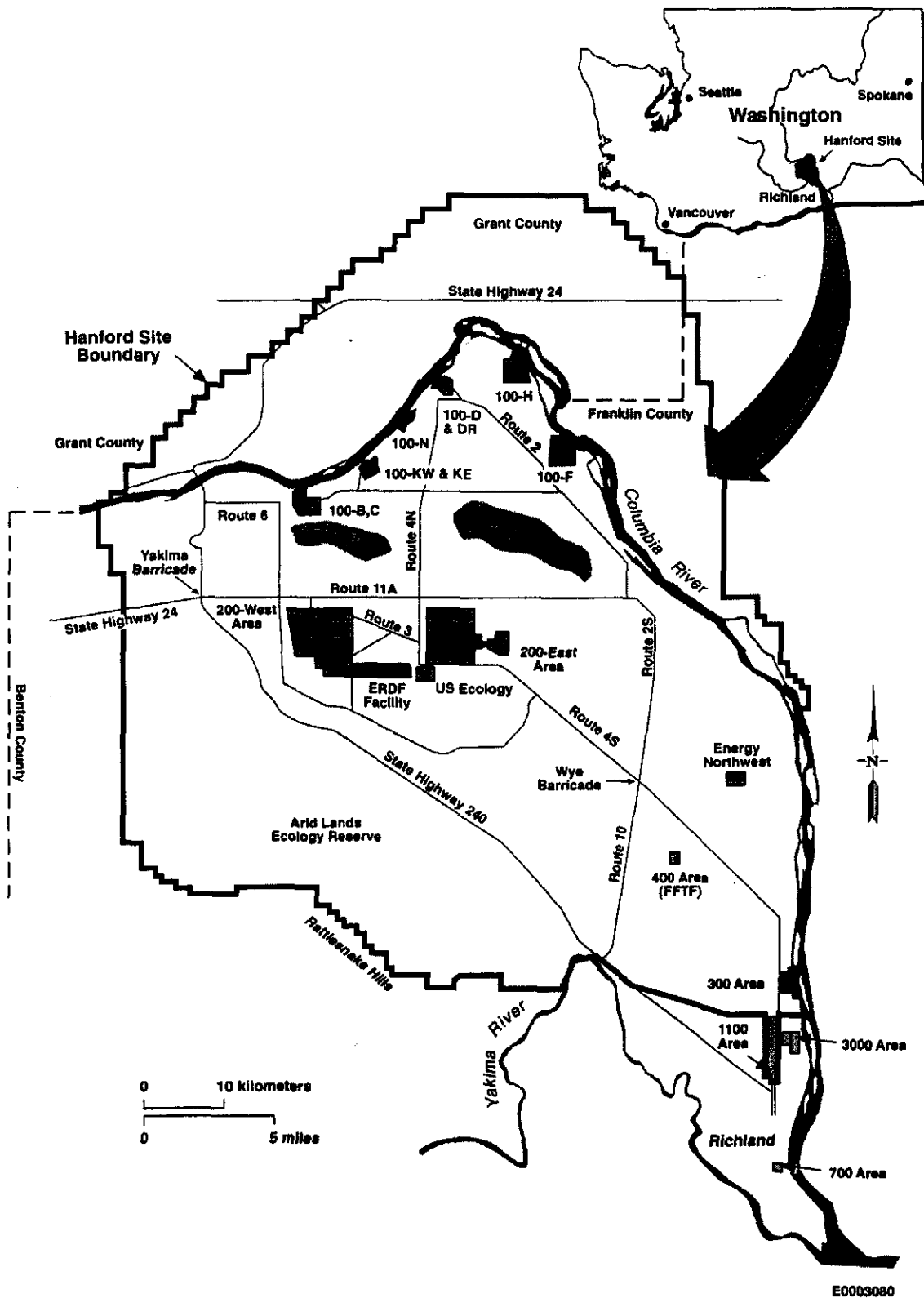
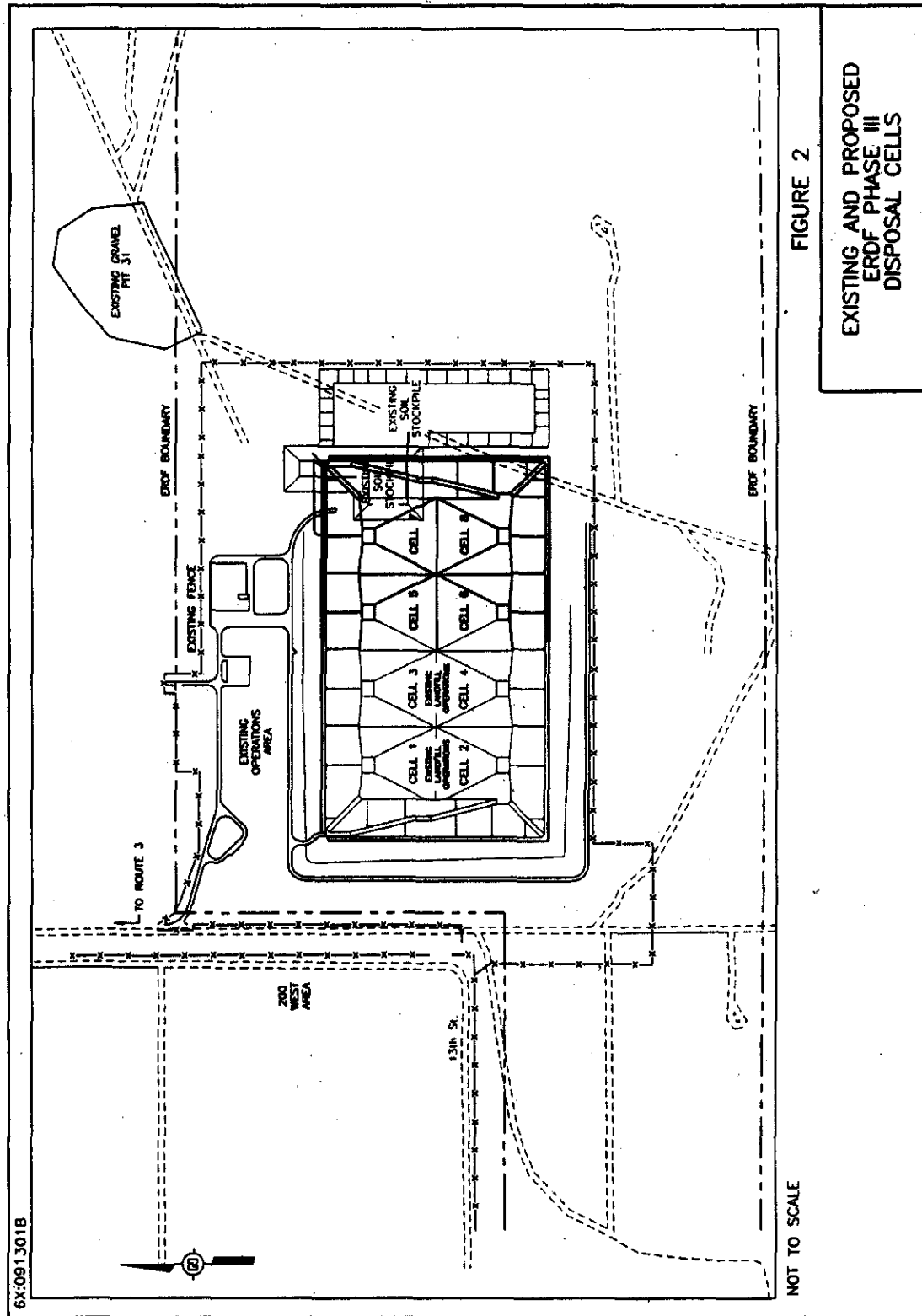


Figure 2. Existing and Proposed ERDF Phase III Disposal Cells.



Disposal of contaminated material at ERDF has been chosen as the preferred remedy for waste excavated from numerous Hanford waste sites. The current estimate is that approximately 10 million tons of waste from 100 and 300 Areas remediation will be disposed at ERDF. Estimates for waste that may originate from remediation of the 200 Areas or from most D&D projects remain unknown at this time.

The approximate amount of waste received at ERDF through June 2001 was 3 million tons, or an average 600,000 tons annually. When considering the RODs that are currently in place, remediation is expected to continue at this rate through the year 2003. With the waste capacity of the four disposal cells presently in operation being a maximum of 5.2 million tons, the current capacity will be exhausted by January 2005. The period necessary for design and construction of two new disposal cells at ERDF is approximately 20 months.

Remediation Waste Staging at ERDF

The selected remedial alternative in existing 100 and 300 Area RODs is typically removal, treatment (if required), and disposal at ERDF. Treatment is required if the concentration of contaminants in the waste is above land disposal restriction standards found in Federal and state hazardous waste regulations, which are incorporated into ERDF waste acceptance criteria. This Proposed Plan presents the option of conducting remediation waste staging at ERDF rather than at the operable unit prior to treatment and disposal.

Experience has indicated that a limited amount of waste will require treatment. The waste found thus far requiring treatment includes contaminated debris such as lead bricks, other metal-contaminated material, and contaminated oil. It is likely that other types of contaminated debris, as well as some soils and sludges, will also require treatment. In general, material requiring treatment is held at the remediation site prior to being transported to ERDF.

This plan proposes allowing the staging of remediation waste at ERDF while it awaits treatment at the ERDF or elsewhere. Treatment would be performed in accordance with ERDF waste acceptance criteria and in compliance with land disposal restrictions. The decision whether to perform remediation waste treatment and the specific treatment needed will be documented as part of the remedy selection and remedial design process for the operable unit or the waste site of origination.

The staging area at ERDF would be operated in accordance with RCRA regulations for corrective action management units (CAMUs). Staging of waste prior to treatment likely increases overall efficiency, reduces costs, and eliminates the storage of wastes at multiple locations while awaiting treatment. A centralized staging area would reduce the need for multiple staging areas and associated operating expenses. Staging the waste has the additional benefit of allowing closeout of a remediation site after all of the waste has been removed.

Proposed rule 40 CFR 264.552(f) establishes standards for storage of hazardous waste in CAMUs. The ROD amendment will not be issued until the proposed rule (65 *Federal Register* 51080) is promulgated, which is expected in late calendar year 2001. The proposed rule is more stringent than the existing regulations and will become applicable in Washington State upon promulgation. Staging of waste at ERDF will comply with these new standards. Although these standards generally prohibit storage of wastes containing free liquids in CAMUs, such storage is allowed when the liquid is a necessary part of the selected remedy. In the case of pyrophoric uranium wastes, liquids are necessary in the waste containers to prevent spontaneous combustion. While staged, any containers holding liquid waste will be kept within larger outer containers (i.e., "overpack" containers) or will be provided with some other means of secondary containment. These outer containers will also provide the roof, walls, and non-porous floor required for polychlorinated biphenyl (PCB) storage facilities in accordance with 40 CFR 761.65(b).

The duration of staging under the CAMU rules will be 2.5 years, with possible extensions granted by EPA upon appropriate demonstration of protectiveness and need. Such extensions, if needed, will include provisions for groundwater monitoring consistent with the ERDF groundwater monitoring network. In addition, the CAMU regulations generally require provision of a composite liner and leachate collection system if waste is staged for a period exceeding the timeframe normally allowed in staging piles, unless alternative design and operating practices are instituted that prevent migration of waste to the groundwater. Overpacking the containers holding liquid waste and establishing a routine waste container inspection program will serve as alternative design and operating practices in lieu of a liner/leachate collection system.

EVALUATION OF ENVIRONMENTAL IMPACTS

ERDF Phase III Construction

The four proposed cells would be constructed on an as-needed basis and located within the 4.1 km² (1,024 acres) selected in the ERDF ROD. The ERDF is being designed and constructed in phases to minimize impact to the environment. The ERDF ROD and amendment authorized construction on a total of 0.95 km² (235 acres). The environmental impact from the entire ERDF operation was evaluated in the remedial investigation and feasibility study (RI/FS) and the Proposed Plan that preceded the ERDF ROD.

As previously documented, ecological impacts will occur at the ERDF site and borrow sites for the materials used in the liner and cover. These impacts will include destruction of habitat, displacement of wildlife, and disturbance of wildlife along transportation routes. Habitat impacts from construction of the new disposal cells will be minimized by locating the Phase III cells and staging area entirely within the previously selected ERDF site. Using the lined, deep, single-trench configuration, the disturbed area needed for Phase III construction of ERDF (including the trench, container handling, material stockpile, and support facilities) is estimated to require an additional 0.3 km² (85 acres) (maximum) (Figure 2).

Clearing the additional area would take place so bird nesting season would not be impacted. No additional clearing is anticipated for the staging area because the staging area will only occupy slightly over 0.004 km² (1 acre).

To the extent possible, soil excavated during new cell construction will be used or stockpiled in previously disturbed areas for later use. This will minimize the amount of undisturbed land needed for construction of the Phase III cells. Additional mitigation options will be evaluated with input from affected stakeholders. DOE, in coordination with the Natural Resources Trustees, will review and revise the ERDF mitigation action plan for additional mitigation measures, as appropriate.

CERCLA EVALUATION CRITERIA

CERCLA provides nine criteria for evaluating detailed alternatives (see box on page 7). The relative performance of each original ERDF design alternative was evaluated with respect to the nine criteria identified in the NCP.

These criteria fall into three categories: the first two (overall protection of human health and the environment, and compliance with **applicable or relevant and appropriate requirements** [ARARs]) are considered to be threshold criteria and must be met. The next five items are considered to be balancing criteria and are used to compare the technical and cost aspects of alternatives. The final two criteria (state and community acceptance) are considered to be modifying criteria. Modifications to decisions may be made based on state and public comments and concerns.

SUMMARY OF ALTERNATIVES

Expansion Alternatives

- **Alternative 1E – No Action.** The no-action alternative consists of not constructing the Phase III expansion of the ERDF trench to accommodate additional waste from remediation or the staging area.
- **Alternative 2E – ERDF Phase III Construction.** Four additional cells would be constructed at ERDF to provide additional capacity for ongoing remediation of the 100 and 300 Areas. Disposal cells would be constructed, two at a time, using a phased approach.

The ERDF Phase III construction would use the same design used for construction of the first four disposal cells. Therefore, the previous evaluation of the threshold and balancing criteria in the 1995 Proposed Plan and ERDF ROD remains applicable.

Staging Alternatives

- **Alternative 1S – Staging at the Operable Unit.** Staging would continue be performed only at the operable unit.
- **Alternative 2S – Staging at ERDF.** Staging of waste from remedial actions and D&D activities would be performed at the ERDF. Staging and treatment determinations would still be documented as part of the CERCLA remedy selection process for the operable unit or D&D activity. This option does not preclude staging at the operable units.

EXPLANATION OF CERCLA EVALUATION CRITERIA

1. **Overall Protection of Human Health and the Environment:** An assessment is made to determine whether the alternatives can adequately protect human health and the environment, both in the short-term and long-term, by eliminating, reducing, or controlling exposure. Overall protection of human health and the environment draws on the assessments of other evaluation criteria, especially long-term effectiveness and permanence, short-term effectiveness, and compliance with ARARs.
2. **Compliance with Applicable or Relevant and Appropriate Requirements (ARARs):** This criterion addresses whether a remedy will meet all of the ARARs of other (non-CERCLA) Federal and state environmental laws and/or provides justification for waivers (if necessary).
3. **Long-Term Effectiveness and Permanence:** Alternatives are assessed for the long-term effectiveness and permanence that they provide following implementation, as well as the degree of certainty that the alternative will prove to be successful.
4. **Reduction of Toxicity, Mobility, or Volume Through Treatment:** This criterion is evaluated based on the anticipated performance of any treatment technologies that may be employed in a remedy.
5. **Short-Term Effectiveness:** The short-term impacts of alternatives shall be assessed, considering the risks that might be posed to the public during implementation of an alternative, potential impacts on workers during remedial actions, and the amount of time until protection is achieved.
6. **Implementability:** The ease or difficulty of implementing the alternatives is assessed by considering technical difficulties and unknown factors associated with the construction and operation of a technology, availability of services and materials, and administrative feasibility.
7. **Cost:** Costs that should be considered include capital costs, operation and maintenance costs, and the net present value of capital and operation/maintenance costs.
8. **State Acceptance:** Based on the state's review of the final RI/FS report and the Proposed Plan, this criterion is assessed based on whether the state concurs with, opposes, or has no comment on the preferred alternative.
9. **Community Acceptance:** This criterion is assessed following a review of the public comments received on the Proposed Plan.

EVALUATION OF ALTERNATIVES

1. **Overall protection of human health and the environment:** The no-action alternative does not satisfy the criterion of overall protection of human health and the environment. When the current ERDF capacity is reached and new disposal cells have not been constructed, the pace of remediation efforts in the 100 and 300 Areas will be dramatically slowed. The result of this slowdown will be to leave contaminated soil at remediation sites for a longer period of time, thus causing increased risk to human health and the environment. For this reason, the no-action alternative is not evaluated further.

The construction of the Phase III expansion would satisfy overall protection of human health and the environment.

The same general approach to staging would be implemented whether staging was conducted at ERDF or at the operable unit where the waste originated. In many instances, staging waste at ERDF would be more protective of human health and the environment

(i.e., located further from the Columbia River and groundwater), would be effective in the short-term and long-term, and would be implementable.

2. **Compliance with ARARs:** The most significant ARARs for construction and operation of a disposal facility receiving hazardous/dangerous waste include Federal and state landfill requirements. The Phase III expansion would comply with the ARARs specified in the original ERDF ROD.

Staging waste at either the ERDF site or at the operable unit would comply with substantive Federal and state requirements. Significant ARARs include proposed 40 CFR 264.552(f) for staging of hazardous waste within a CAMU and 40 CFR 761.65(b) for staging of PCB waste. Additionally, radioactive waste management ARARs and to-be-considered standards will be addressed.

3. **Long-term effectiveness and permanence:** Expansion of the ERDF would provide long-term isolation of waste resulting from remedial actions at the Hanford Site.

Staging, by definition, is not long-term. However, the staging of waste will support long-term effectiveness by facilitating treatment.

4. Reduction of toxicity, mobility, or volume through treatment: Treatment of waste prior to disposal at ERDF reduces the toxicity, mobility, or volume. Waste treatment will generally be considered in the feasibility studies, proposed plans, RODs, and design documents for the individual operable units.

5. Short-term effectiveness: Expansion would require additional construction activity and, therefore, would increase short-term risk for workers. This leads to a lower ranking for overall short-term effectiveness.

Risks posed to the public, workers, or the environment as a result of the staging location would be negligible. However, the additional handling steps required for staging may increase overall risks to workers. Environmental risk would be lower at ERDF because of the location away from the Columbia River and the distance to groundwater.

6. Implementability: Similarly to Phases I and II, the Phase III expansion would use a double liner, therefore increasing the complexity of the task and ranking lower in terms of technical implementability.

Staging the waste is considered implementable, regardless of the location. A single, centralized staging location is generally considered more efficient and, therefore, less difficult to implement than providing separate staging areas at each remedial action site.

7. Cost: It is estimated the construction of the four Phase III disposal cells would cost approximately \$40 million (from design through the start of operation).

Operating costs of staging areas located at remediation sites would be comparable to those at the ERDF. Construction costs for remediation site staging areas would be negligible. The estimated cost to construct the staging area at the ERDF is approximately \$100,000.

8. State acceptance: Ecology supports the ERDF Phase III construction. Ecology also supports the proposal to allow waste staging at ERDF.

9. Community acceptance: Public acceptability will be evaluated after the close of the public comment period for this Proposed Plan. Modifications to the proposed actions may be made based on public comments.

SUMMARY

This Proposed Plan is being issued by the Tri-Parties and includes two elements intended to promote Hanford Site cleanup activities by broadening utilization and operation of ERDF:

1. Construct Phase III of ERDF using the current disposal cell design. The Phase III construction would be located entirely within the area selected in the ERDF ROD. Using the lined, deep, single-trench configuration, the disturbed area needed for Phase III construction of ERDF (including the trench, container handling, material stockpile, and support facilities) is estimated to require an additional 0.3 km² (85 acres) (maximum). The period necessary for design and construction of two disposal cells is approximately 20 months.

2. This plan proposes allowing remediation waste to be staged at ERDF prior to treatment and disposal. The staging area will occupy slightly more than 0.004 km² (1 acre). Conducting staging activities at ERDF is likely to increase efficiency and reduce costs. The higher construction costs for staging at the ERDF are offset by the decreased risks to the environment and the public.

Based on the information available at this time, the Tri-Parties believe that the preferred alternatives would be protective of public health and the environment, would comply with ARARs, would be cost effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Treatment of wastes will be addressed in the operable unit decision documents. As a result, the statutory preference for treatment as a principal element will be addressed in these future documents rather than in this proposed ROD amendment.

The public is invited to comment on the proposed modifications to the ERDF ROD.

POINTS OF CONTACT

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U.S. Environmental Protection Agency
Representative (Region 10)

David Einan
Project Manager
(509) 376-3883

ADMINISTRATIVE RECORD

The public is encouraged to review the documents and all information for prior decisions at the operable units and ERDF. The Administrative Record file, which contains the information used to select the proposed ERDF design and operable unit remedial actions, is available at the following locations:

U.S. Department of Energy,
Richland Operations Office
Administrative Record Center
2440 Stevens Center Place
Richland, Washington 99352

U.S. Environmental Protection Agency
Region 10
Superfund Record Center
1200 Sixth Avenue
Park Place Building, 7th Floor
Mail Stop: HW-074
Seattle, Washington 98101

Washington Department of Ecology
Administrative Record
719 Sleater-Kinney Road SE
Capital Financial Center Building, Suite 200
Lacey, Washington 98503-1138

PUBLIC INFORMATION REPOSITORIES

All documents in the regulatory packages are available for review at the Hanford Tri-Party Agreement Public Information Repositories:

University of Washington
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Box 3529000
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(206) 543-4664

Gonzaga University
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U.S. DOE Reading Room, Room 101L
100 Sprout Road
Richland, Washington 99352
(509) 372-7443

GLOSSARY

The first usage of technical terms and other specialized text in this Proposed Plan is shown in bold in the document and the terms are defined below.

Administrative Record – The files containing all of the documents used to select a response action at a CERCLA remedial action site. Locations where the Administrative Record for the Hanford Site is maintained are provided in this Proposed Plan.

Applicable or relevant and appropriate requirements (ARARs) – Cleanup standards, standards of control, and other environmental protection requirements based on Federal or state laws that address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, or that address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well-suited to the particular site.

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) – A Federal law that establishes a program to provide for the identification of hazardous waste sites to ensure that sites are cleaned up, and to allow government entities to evaluate damages to natural resources. CERCLA is also known as “Superfund.”

Cost-effective – In accordance with the Superfund National Contingency Plan, Section 300.430(f)(1)(ii)(D), a cost-effective remedy is one with costs that are proportional to its overall effectiveness. The “overall effectiveness” of a remedial alternative is determined by evaluating (1) long-term effectiveness and permanence; (2) reduction in toxicity, mobility, and volume through treatment; and (3) short-term effectiveness.

Decontamination and decommissioning (D&D) – Stabilization and maintenance or removal of inactive surplus facilities to reduce potential environmental, human health, and safety hazards.

Environmental Restoration Disposal Facility (ERDF) – The Hanford Site’s disposal facility for most waste and contaminated environmental media (contingent upon meeting the ERDF waste acceptance criteria) generated under a CERCLA remedial action. The ERDF currently receives wastes from ongoing remedial actions in the Hanford National Priorities List sites.

Explanation of Significant Difference (ESD) – Documentation of information obtained after the ROD is signed that EPA determines results in a significant change in a component of the remedy chosen in the ROD, as determined by EPA.

Operable unit – A group of waste sites placed together for the purposes of investigation and subsequent cleanup actions.

Proposed Plan – A fact sheet that summarizes, for public review and comment, the analysis of different cleanup options.

Record of Decision (ROD) – The formal document in which a regulatory agency sets forth the selected remedial measure and the reasons for its selection.

Remedial alternative – General or specific actions that are evaluated to determine the extent to which they can eliminate or minimize threats posed by contaminants to human health and the environment.

Resource Conservation and Recovery Act of 1976 (RCRA) – A Federal law that establishes the requirements for the storage, treatment, and disposal of hazardous waste.

Waste sites – Sites that are contaminated or are potentially contaminated due to past operations. Contamination may be contained in environmental media (e.g., soil or groundwater) or in man-made structures or waste (e.g., debris).

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